

EXHIBIT A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SAHIL HASSAN,

Plaintiff,

-against-

PETER ELLIOT DIRECT LLC,
ELLIOT RABIN, and ISABELLE
McNALLY,

Defendants.

USDC SDNY
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DATE FILED: 5/31/16

Civil Action No. 15 Civ. 6285 (CM)
(RLE)

**PROPOSED STIPULATION AND ORDER
OF DISMISSAL, WITH PREJUDICE**

It is hereby stipulated and agreed by and between Plaintiff Sahil Hassan ("Plaintiff") and Defendants Peter Elliot Blue ("PEB" or the "Company") (sued incorrectly herein as Peter Elliot Direct LLC), Eliot Rabin (sued incorrectly herein as Elliot Rabin), and Isabelle McNally (collectively "Defendants"), through their undersigned counsel, who are authorized to enter into this stipulation, that the Settlement Agreement and Release in this matter, having been reviewed by the Court and found to be fair and reasonable, the First Cause of Action in Plaintiff's Complaint in the above-captioned action is dismissed in its entirety, with prejudice, in accordance with the terms of the Settlement Agreement and Release.

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Dated: May 19, 2016

Dated: May 20, 2016

5/31/2016
order
Call
2/1/16